

Name of Briefing: City of Largo POTW**October 8, 2020, 2:30-3:30pm****Background:**

FLDEP submitted a major modification of the City of Largo AWWTF permit 7/14/2020 for public notice. Tampa Bay Waterkeepers wrote to EPA with concerns about the legality of the modifications made in the permit.

Issues:

The Tampa Bay River keeper raised two concerns in the modification of the Total Nitrogen effluent limits and how compliance is being calculated. The modified permit calculates the Total Nitrogen (TN) effluent limit dictated by the TMDL by using a Reduced Total Nitrogen (RTN) calculation. The RTN is being calculated for compliance with TN effluent limits to account for the proposed 30% reduction of Total Nitrogen that the golf course retention ponds provide before the wastewater enters Feather Sound and eventually Tampa Bay. There is concern that changing the sampling location allows the facility to release 30% more TN to meet the TMDL wasteload allocation and is considered backsliding per 40 CFR 122.44(l)(2).

The second concern raised is in the change of the compliance sampling location for the nitrogen concentrations. The permit maintains the sampling location from the previous permit of after disinfection, however verification of this load will be confirmed by using a 12-month grab sample taken at the outfall after the golf course ponds (OTH-01). There is concern that the City of Largo is claiming the reductions the golf course ponds (considered waters of the state) provide prior to entering waters of the US, while not owning that part of the treatment.

Recommendation:

(b)(5)

Actions:**CONTACTS**

Craig Hesterlee, NPDES Permitting Section Chief, 562-9749, Hesterlee.craig@epa.gov

Paul Schwartz, ORC, 562-9576, schwartz.paul@epa.gov

Carla Dollar, NPDES Permitting Section, 562-9299, dollar.carla@epa.gov